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Rachel Perillo

March 30, 2023

**By ECF**

Hon. Jesse M. Furman  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: United States v. Mustapha Raji  
19 Cr. 870 (JMF)

Dear Judge Furman:

I am the attorney for Mustapha Raji, the defendant in the above-named matter. This letter is respectfully submitted without objection from the government, by AUSA Catherine Ghosh, and Probation Officer Alyssa Lopez to request an extension of time to submit objections to the Presentence Report ("PSR") as well as an adjournment of sentencing.

The PSR was initially disclosed on March 15, 2023. The deadline for the defense to submit objections to Probation was yesterday, March 29. Mr. Raji's sentencing submission is due on April 4, 2023, and he is scheduled to be sentenced on April 18, 2023. It is respectfully requested that counsel be afforded an additional ten days to submit PSR objections to Probation because, given the current conditions at the Metropolitan Detention Center, more time is needed to meet with Mr. Raji to review the report and discuss his objections. Additionally, in light of the recent disclosure of the PSR, the fact that we recently received and need to review Mr. Raji's BOP medical records, and that we are still awaiting the receipt of family letters and other important documents needed for our sentencing submission, it is respectfully requested that Mr. Raji's sentencing be adjourned to May 16 or May 17, 2023.

If the Court has any questions regarding this application please do not hesitate to contact me.

Respectfully submitted,

/s/

Jeremy Schneider

cc: AUSA Catherine Ghosh (by ECF)